

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CANTON PORT SERVICES, LLC

Plaintiff,

v.

M/V INDIGO SPICA
(IMO No. 9708758),

her engines, boilers, apparel, tackle, boats,
appurtenances, etc., *in rem*,

Defendant.

IN ADMRALTY

Case No.

**VERIFIED COMPLAINT TO ARREST
VESSEL TO FORECLOSE A
MARITIME LIEN**

Plaintiff, Canton Port Services, LLC (“Canton” or “Plaintiff”) by its undersigned attorneys, files this Verified Complaint against the M/V INDIGO SPICA (IMO No. 9708758), her engines, boilers, apparel, tackle, boats, appurtenances, etc., *in rem* (the “Vessel”), pursuant to Fed. R. Civ. P. *Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions* (SAR) Rule C, seeking to foreclose a maritime lien for necessities and the issuance of a warrant of arrest for the Vessel, and alleges upon information and belief as follows:

I. JURISDICTION AND VENUE

1. This is a case of admiralty and maritime jurisdiction within the meaning of Fed. R. Civ. P. 9(h) and Title 28 U.S.C. §1333. Original and exclusive jurisdiction of all such suits is vested in the district courts of the United States.

2. This Verified Complaint is *in rem* against the Vessel with a prayer for the issuance of a warrant of arrest pursuant to SAR Rule C of the Federal Rules of Civil Procedure.

VERIFIED COMPLAINT TO ARREST VESSEL
TO FORECLOSE A MARITIME LIEN - 1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WASHINGTON 98111-9402
206.223.7000 FAX: 206.223.7107

III. STATEMENT OF FACTS

9. Upon information and belief, at all relevant times hereto, Hanwin chartered the Vessel. The Vessel was primarily carrying plywood which, upon the Vessel's arrival at the Canton Pier in Baltimore in July 2022, was confirmed to be damaged and distressed.

10. At the direction and with the approval of the Master of the Vessel, the Vessel arrived at the Canton Pier on or about July 19, 2022, for the unloading of distressed cargo from the Vessel.

11. Subject to the direction and with the approval of the Master of the Vessel, Canton provided stevedoring services to the Vessel and unloaded the Vessel from July 19, 2022, to July 25, 2022 (the "First Call").

12. The Master of the Vessel, an authorized agent for the owner of the Vessel, authorized and approved the stevedoring services provided by Canton by, *inter alia*, signing/stamping daily Canton Stevedoring Team Activity Reports, which describe the services provided by Canton to the Vessel each day during the First Call. See Exhibit 1, Canton Stevedoring Team Activity Reports for 07/19/2022 – 07/25/2022.

13. Canton issued two invoices – Invoice Nos. 132468 and 132454 (the "First Call Invoices") – for the services Canton rendered to the Vessel during the First Call. See Exhibit 2, Invoice Nos. 132468 and 132454.

14. Both of the First Call Invoices were paid for in full, and Plaintiff has no maritime lien claim arising out of the First Call Invoices.

15. Due to the cargo's distressed condition, the offloading of the Vessel could not be completed during the First Call. Thus, the Vessel had to be brought back to the Canton Pier a few days after completion of the First Call to complete the offloading of the remainder of the cargo.

16. At the direction and with the approval of the Vessel's Master, the Vessel returned to the Canton Pier on August 6, 2022, for the offloading of the remaining cargo.

17. Subject to the direction and with the approval of the Vessel's Master, Canton provided stevedoring services to the Vessel and unloaded the Vessel from August 6, 2022, to August 12, 2022 (the "Second Call").

18. Once again, the Master of the Vessel, an authorized agent for the owner of the Vessel, authorized and approved the stevedoring services provided by Canton by, *inter alia*, signing/stamping daily Canton Stevedoring Team Activity Reports, which describe the services provided by Canton to the Vessel each day during the Second Call. See **Exhibit 3**, Canton Stevedoring Team Activity Reports 08/06/2022 – 08/12/2022.

19. On August 16, 2022, Canton issued Invoice No. 132524 (the "Second Call Invoice") in the amount of \$233,006.00 for the stevedoring services Canton rendered to the Vessel during the Second Call. See **Exhibit 4**, Second Call Invoice - Invoice No. 132524. All charges in the Second Call Invoice are related to the discharging of distressed cargo from the Vessel by Canton.

20. To date, Canton has not received any payment for the Second Call Invoice. The entire Second Call Invoice in the amount of \$233,006.00 remains unpaid.

21. In accordance with customary maritime practice and the federal general maritime law, Canton provided a necessary – stevedoring of cargo to be offloaded – to the Vessel. The stevedoring services constitute a maritime lien for necessities to the Vessel consistent with the *Commercial Instruments and Maritime Liens Act*, 46 U.S.C. § 31342 (CIMLA).

22. Canton has a maritime lien against the Vessel in the amount of \$233,006.00 for the value of the stevedoring services Canton rendered to the Vessel during the Second Call.

23. Canton is entitled to a judgment against said Vessel, *in rem*, in the amount of \$233,006.00 together with interest, fees, costs, including but not limited to expenses *in custodia legis*.

**Count I – Prayer for the Arrest of the Vessel
Pursuant to Supplemental Rule C**

24. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-23 above.

VERIFIED COMPLAINT TO ARREST VESSEL
TO FORECLOSE A MARITIME LIEN - 4

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206.223.7000 FAX: 206.223.7107

1 25. Canton provided stevedoring services to the Vessel on the order of the owner of the
2 Vessel and/or a person authorized by the owner of the Vessel.

3 26. The Master of the Vessel acknowledged, approved, and signed off on the
4 stevedoring services provided by Canton during the duration of the Second Call. *See **Exhibit 3.***

5 27. To date, Canton has not been paid for the stevedoring services it provided to the
6 Vessel.

7 28. Thus, Canton holds a maritime lien against the Vessel for the stevedoring services
8 it provided to the Vessel in the amount of \$233,006.00.

9 29. Rule C of the *Federal Supplemental Rules for Admiralty or Maritime Claims and*
10 *Asset Forfeiture Actions* (SAR) authorizes Canton to assert and foreclose its maritime lien against
11 the Vessel *in rem*.

12 30. Accordingly, pursuant to SAR Rule C, Canton is entitled to foreclose its maritime
13 lien for necessities against the Vessel and requests that this Honorable Court issue an order and
14 warrant for arrest of the Vessel and enter judgment against the Vessel.

15 WHEREFORE, Plaintiff, Canton Port Services, LLC, prays that:

16 A. This Honorable Court issue an Order directing the clerk to issue a warrant for the
17 arrest of the Vessel, *in rem*, pursuant to SAR Rule C;

18 B. That any security thereafter fixed by this Honorable Court be conditioned for the
19 maximum amount permitted by SAR Rule E(5), which permits up to twice the amount of
20 Plaintiff's claim;

21 C. The claim of Plaintiff be adjudged to be a maritime lien on the Vessel and that a
22 judgment be entered in favor of Plaintiff against the Vessel in the amount of \$233,006.00, plus
23 interest, costs, and attorney's fees, and that the Vessel be condemned and sold to pay the same;
24 and

25 D. This Honorable Court grant such other and further relief as it deems just and proper.
26
27

DATED: November 15, 2023

LANE POWELL PC

By: s/Katie Smith Matison

Katie Smith Matison, WSBA No. 20737

s/Daniel Miller

Daniel Miller, WSBA No. 56810

1420 Fifth Avenue, Suite 4200

P.O. Box 91302

Seattle, Washington 98111-9402

Telephone: 206.223.7000

matisonk@lanepowell.com

dmiller@lanepowell.com

Attorneys for Canton Port Services, LLC

Pro Hac Vice Admission to Be Filed

GORMAN & WILLIAMS

Ashley L. Ensor

David McL. Williams

36 South Charles Street, Suite 900

Baltimore, MD 21201

Tel: 410-528-0600

Fax: 410-528-0602

aensor@gw-law.com

dmwilliams@gw-law.com

VERIFIED COMPLAINT TO ARREST VESSEL
TO FORECLOSE A MARITIME LIEN - 6

444444.1709/9569726.1


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1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WASHINGTON 98111-9402
206.223.7000 FAX: 206.223.7107

VERIFICATION

I, Timothy J. Kassel, Executive Vice President of Canton Port Services, LLC, hereby verify under the penalties of perjury of the Laws of the State of Washington and the United States of America that the foregoing Verified Complaint is true and correct based upon my personal knowledge, documents that have become available to me, and upon information and belief, and that I am authorized to verify the Verified Complaint filed herein.

Pursuant to 28 U.S.C. § 1746, I verify under the penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of November, 2023.



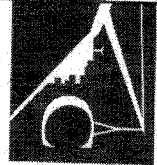
Timothy J. Kassel
Executive Vice President
Canton Port Services, LLC

VERIFIED COMPLAINT TO ARREST VESSEL
TO FORECLOSE A MARITIME LIEN - 7

444444.1709/9569726.1

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EXHIBIT 1



ANTON

STEVEDORING

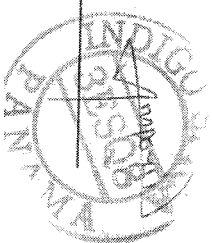
Team Activity Report

Phone: 410-633-1601
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/19/2022	Tuesday	MV Indigo Spica			Michalos / Remy	Canton - Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo			Beattie / Rodgers / Gallarago	PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2			Shifted stow, broken bands/straps.
1300-1400		Lunch Break					
1400-1700	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
GANG 2							
0700-0715		Safety Meeting					1700 - Gang knocked off due to lack of trucks.
0715-1300	5	Discharging Plywood		4			
1300-1400		Lunch Break					
1400-1700	5	Discharging Plywood		4			1700 - Gang knocked off due to lack of trucks.
GANG 3							
1700-1900		Loading Trucks/Warehouse					1700-1900 Continue loading trucks and transferring plywood to warehouse.
No Stevedore Damage to Vessel							
Daily Total: 1002 x total plywood bundles discharged * 128 x plywood bundles transferred to warehouse * 16 x bundles will require recouping							

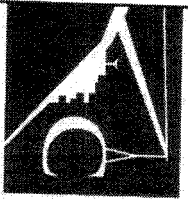
Stevedore Superintendent:

Captain/ChiefMate:



SuperCargo/Port Captain:

37



ANTON

Team Activity Report

Phone: 410-633-1601
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/20/2022	Wednesday	Indigo Spica			Michalos/ Reimer		Ships Gear
Team Hours	Hold	Activity & Cargo			Rodgers/ Gallaraga	PH XL SB	Remarks
Gang 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps
1300-1400		Lunch					
1400-1900	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps
Gang 2							
0700-0715		Safety Meeting					
0715-1300	5	Discharging Plywood		4		X	Brick Stowage
1300-1400		Lunch					
1400-1900	5	Discharging Plywood		4		X	Brick Stowage
At 1520 Ships crew was testing fire equipment and several crates got wet							
Daily Total: 463 plywood crates							
2x dumpsters used							
No Stevedore Damage to Vessel							

Stevedore Superintendent:

Captain/ChiefMate:



SuperCargo/Port Captain:

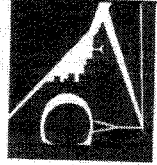

ANTON
 STEVEDORING

Team Activity Report

 Phone: 410-633-1601
 Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/21/2022	Thursday	MV Indigo Spica			Michalos / Remery	Canton - Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo			Beatley / Rodgers / Gallardo	PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
1300-1400		Lunch Break					
1400-1900	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
GANG 2							
0700-0715		Safety Meeting					
0715-1200	5	Discharging Plywood		4		X	Brick stow under combing.
1200-1300	5	Discharging Plywood		4			
1300-1400		Lunch Break					
1400-1900	5	Discharging Plywood		4			
No Stevedore Damage to Vessel							
Daily Total: 624 x total plywood bundles discharged							





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STEVEDORING

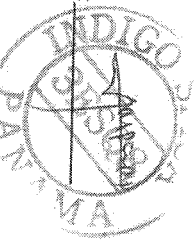
Team Activity Report

Phone: 410-633-1601
Fax: 410-633-3475

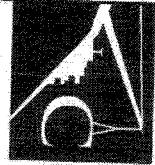
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/22/2022	Friday	MV Indigo Spica			Michalos / Remy	Canton - Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo			Beasley / Rodgers / Gallarago	PH XL SBI	Remarks
GANG 1							
0700-0715	0700-0715	Safety Meeting					
0715-1300	0715-1230	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
1230-1300	1230-1300	Safety Meeting					All Stop
1300-1400	1300-1400	Lunch Break					
1400-1900	1400-1900	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
GANG 2							
0700-0715	0700-0715	Safety Meeting					
0715-1230	0715-1230	Discharging Plywood		4		X	Brick stow under combing.
1230-1300	1230-1300	Safety Meeting					All Stop
1300-1400	1300-1400	Lunch Break					
1400-1900	1400-1900	Discharging Plywood		4		X	Brick stow under combing.
No Stevedore Damage to Vessel							
Daily total: 515 plywood crates 15x bundles required recouping 2x dumpsters used							

Stevedore Superintendent:

Captain/ChiefMate:



SuperCargo/Port Captain:




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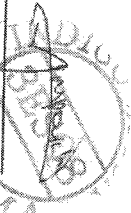
STEVEDORING

Team Activity Report

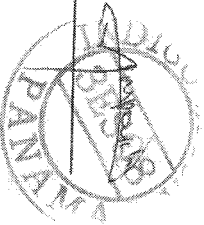
Phone: 410-633-1801
Fax: 410-633-3475

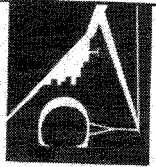
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/23/2022	Saturday	MV Indigo Spica			Michalos/Beetley	Canton - Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo				PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
1300-1400		Lunch Break					
1400-1900	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
GANG 2							
0700-0715		Safety Meeting					
0715-0845	5	Discharging Plywood		4			
0845-1300	5	Discharging Plywood		4		X	Brick stow under combing.
1300-1400		Lunch Break					
1400-1900	5	Discharging Plywood		4		X	Brick stow under combing.
Daily Total: 398 x plywood bundles * 73 x bundles transferred to warehouse. 4 x Dumpsters Used. 1700-1900 Trucks stopped running, continue disch. of vessel and transfer of bundles to warehouse.							
No Stevedore Damage to Vessel							

Stevedore Superintendent: 

Captain/ChiefMate: 

SuperCargo/Port Captain: _____



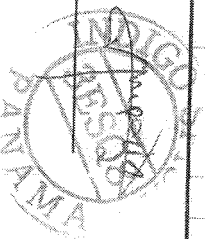

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STEVEDORING
Team Activity Report

 Phone: 410-633-1601
 Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/24/2022	Sunday	MV Indigo Spica			Michalos/Bealey	Canton - Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo				PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
1300-1400		Lunch Break					
1400-1900	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
GANG 2							
0700-0715		Safety Meeting					
0715-1015	5	Discharging Plywood		4		X	Brick stow under combing.
1015-1300	5	Discharging Plywood		4			
1300-1400		Lunch Break					
1400-1530	5	Discharging Plywood		4			
1530-1900	5	Discharging Plywood		4		X	Brick stow under combing.
Daily Total: 587 x plywood bundles * 109 x bundles transferred to warehouse. 2 x Dumpsters used 1700-1900 Trucks stopped running, continue disch. of vessel and transfer of bundles to warehouse.							
No Stevedore Damage to Vessel							

Stevedore Superintendent:

Captain/ChiefMate:



SuperCargo/Port Captain:


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 STEVEDORING

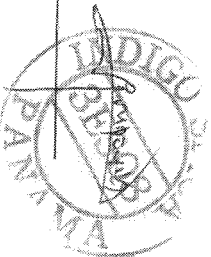
Team Activity Report

 Phone: 410-633-1601
 Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
7/25/2022	Monday	MV Indigo Spica			Michalos/Bealey	Canton - Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo			Galaraga	PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Brick stow under combing.
1300		ALL GANGS KNOCKED OFF					
GANG 2							
0700-0715		Safety Meeting					
0715-1300	5	Discharging Plywood		4		X	Brick stow under combing.
1300		ALL GANGS KNOCKED OFF					
1600		ILA Garuntee Time 1600					Daily Total: 269 x plywood bundles discharged * 6 bundles transferred to warehouse
No Stevedore Damage to Vessel							

Stevedore Superintendent:

Captain/ChiefMate:



SuperCargo/Port Captain:

EXHIBIT 2

Canton Port Services LLC

3800 Newgate Avenue, Ste 2

Baltimore, MD 21224

TEL: 410-633-1601

Fax: 410-633-3475

Date	Invoice #
7/12/2022	132468

		Bill To
Vessel / Voyage	MV Indigo Spica	Hanwin Shipping Limited
Date of Arrival	7/12/2022	
		Attention: Justin Cao

Quantity	Rate	Description	Amount
11,550.83	14.00	Stow to Hook USD 14.00 per MT Weight: 11,550.83	161,711.62

REMIT TO Canton Port Services LLC
C/O Chase
JP Morgan Chase, N.A.
Fed. Routing No. 021000021
Account No. 766833995
Swift Code: CHASUS33

Terms

Total	\$161,711.62
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Balance Due	\$161,711.62
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Canton Port Services LLC

3800 Newgate Avenue, Ste 2

Baltimore, MD 21224

TEL: 410-633-1601

Fax: 410-633-3475

Date	Invoice #
7/28/2022	132454

		Bill To
Vessel / Voyage	MV Indigo Spica	Hanwin Shipping Limited
Date of Arrival	7/19/2022	
		Attention: Justin Cao

Quantity	Rate	Description	Amount
116.75	3,200.00	Extra Labor / Distressed Cargo Charges USD 3200.00 per hour 7/19/22 - 10 hrs 7/20/22 - 22 hrs 7/21/22 - 16 hrs 7/22/22 - 20.25 hrs 7/23/22 - 17.5 hrs 7/24/22 - 10 hrs	373,600.00
65	450.00	Overtime Charges USD 450.00 per hour 7/19/22 - 4 hrs 7/20/22 - 6 hrs 7/21/22 - 6 hrs 7/22/22 - 5 hrs 7/23/22 - 22 hrs 7/23/22 - 22 hrs	29,250.00
10	650.00	Dumpster charges USD 650.00 per can 7/20/22 - 2 dumpsters 7/21/22 - 1 dumpster 7/22/22 - 1 dumpster 7/23/22 - 2 dumpsters 7/24/22 - 2 dumpsters 7/25/22 - 2 dumpsters	6,500.00
4,225	-14.00	Credit for Stow to Hook	-59,150.00

REMIT TO Canton Port Services LLC
C/O Chase
JP Morgan Chase, N.A.
Fed. Routing No. 021000021
Account No. 766833995
Swift Code: CHASUS33

Terms

Total

\$350,200.00

Balance Due

\$350,200.00

EXHIBIT 3



ANTON STEVEDORING

Team Activity Report

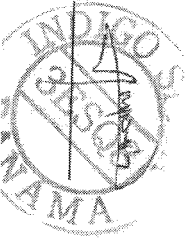
Phone: 410-633-1601
Fax: 410-633-3475

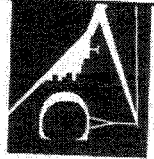
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/6/2022	Saturday	MV Indigo Spica			Michalos/Bealey	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo				PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2			
1300-1400		Lunch Break					
1400-1715	2	Discharging Plywood		2			
1715-1800		ILA Garumlee Time				X	Brick stow under combing. Lull machine/Digging Gear.
GANG 2							
0700-0715	5	Safety Meeting					
0715-1300	5	Discharging Plywood		4			
1300-1400		Lunch Break					
1400-1715	5	Discharging Plywood		4			
1715-1800		ILA Garumlee Time					
GANG 3							
1715-1900		Transferring Plywood					
No Stevedore Damage to Vessel							
1715 - Stop discharging vessel due to lack of available trucks. 1715-1900 Start transferring plywood bundles to warehouse and continue loading available trucks. Daily Total: 699 x plywood bundles discharged from vessel. * 153 x plywood bundles transferred to warehouse. 1 x dumpster filled with dunnage/straps/debris.							

Stevedore Superintendent:

Captain/ChefMate

SuperCargo/Port Captain:





ANTON

STEVEDORING

Team Activity Report

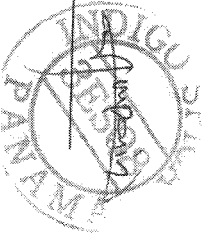
Phone: 410-633-1601
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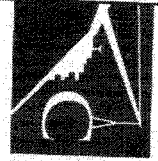
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/7/2022	Sunday	MV Indigo Spica			Michalos/Beatey	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo				PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-0945	2	Discharging Plywood		2			
0945-1300	2	Discharging Plywood		2			
1300-1400		Lunch Break					
1400-1900	2	Discharging Plywood		2			
GANG 2							
0700-0715		Safety Meeting					
0715-1115	5	Discharging Plywood		4			
1115-1600		ILA Guarantee Time					
No Stevedore Damage to Vessel							
Daily Total: 543 x plywood bundles discharged							
* 62 x plywood bundles transferred to warehouse							
3 x dumpster filled with dunnage/straps/debris.							
1115 - Hold 5 complete, all plywood bundles discharged.							
Brick stow under combing. Lull machine/Digging Gear.							
Brick stow under combing. Lull machine/Digging Gear.							

Stevedore Superintendent:

Captain/Chief Mate:

SuperCargo/Port Captain:





ANTON

STEVEDORING

Team Activity Report

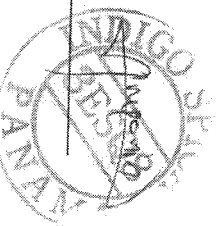
Phone: 410-633-1601
Fax: 410-633-3475

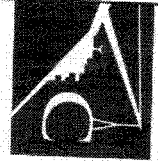
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/8/2022	Monday	MV Indigo Spica			Michalos/Remy	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo			Galaraga	PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0745-1230	2	Discharging Plywood		2		X	Brick slow under combing. Lull machine/Digging Gear.
1230-1330		Lunch Break					
1330-1900	2	Discharging Plywood		2		X	Brick slow under combing. Lull machine/Digging Gear.
No Stevedore Damage to Vessel							
Daily Total: 360 Plywood Bundles							
1 x Dumpster filled with dunnage							

Stevedore Superintendent:

Captain/ChiefMate:

SuperCargo/Port Captain:





ANTON

STEVEDORING

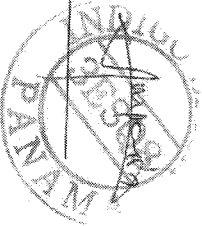
Team Activity Report

Phone: 410-633-1601
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/9/2022	Tuesday	MV Indigo Spica			Michalos/Beatey	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo				PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0745-1300	2	Discharging Plywood		2		X	Brick stow under combing. Lull machine/Digging Gear.
1300-1400		Lunch Break					1215-1300 Removing plate and Lull machine from Hold 2.
1400-1730	2	Discharging Plywood		2			1730 - Stop discharging vessel due to lack of available trucks.
GANG 2							
1730-1900		Transferring Plywood					1730-1900 Start transferring plywood bundles to warehouse and continue loading available trucks.
Daily Total: 490 x plywood bundles discharged.							
140 x plywood bundles transferred to warehouse.							
1 x Dumpster filled with damage							
No Stevedore Damage to Vessel							

Stevedore Superintendent

Captain/ChiefMate



SuperCargo/Port Captain:



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STEVEDORING

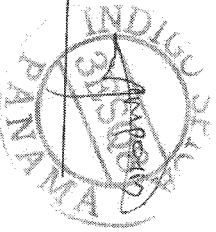
Team Activity Report

Phone: 410-633-1601
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/10/2022	Wednesday	MV Indigo Spica			Michalos/Bealey	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo			Remedy	PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1030	2	Discharging Plywood		2			
1030-1300	2	Discharging Plywood		2			
1300-1400		Lunch Break					
1400-1615	2	Discharging Plywood		2			
1615-1700	2	Standby		2		X	Brick stow under combing. Digging Gear.
1700		All Stop					
No Stevedore Damage to Vessel							
1 x Dumpster filled with dunnage							
Daily Total: 334 x plywood bundles discharged.							
37 x Bundles were transferred to warehouse.							
Inclement Weather							
Inclement Weather							
Inclement Weather							

Stevedore Superintendent:

Captain/ChiefMate:



SuperCargo/Port Captain:



ANTON

STEVEDORING

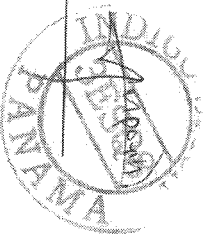
Team Activity Report

Phone: 410-633-1601
Fax: 410-633-3475

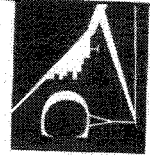
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/11/2022	Thursday	MV Indigo Spica			Michalos/Beateley	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo			Remy	PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-0945		Standby					X Inclement Weather
0945-1300	2	Discharging Plywood		2		X	Brick stow under combing. Digging Gear.
1300-1400		Lunch Break					
1400-1500	2	Discharging Plywood		2		X	Brick stow under combing. Digging Gear.
1500-1715	2	Discharging Plywood		2			
1715-1900	2	Discharging Plywood		2		X	Brick stow under combing. Digging Gear.
Daily Total: 343 x plywood bundles discharged							
* 66 x plywood bundles transferred to warehouse							
1 x Dumpster filled with damage							
No Stevedore Damage to Vessel							

Stevedore Superintendent:

Captain/Chief Mate:



SuperCargo/Port Captain:


ANTON
 STEVEDORING

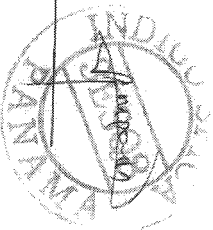
Team Activity Report

 Phone: 410-633-1601
 Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
8/12/2022	Friday	MV Indigo Spica			Michalos/Bealey	Pier 11	Ships Gear
Team Hours	Hatch	Activity & Cargo				PH XL SB	Remarks
GANG 1							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Brick stow under combing.
1300-1600		ILA Garantee Time					1300 - All cargo discharged, vessel complete.
GANG 2							
1100-1300	2	Hold Cleaning				X	1100-1300 Extra Labor utilized to cleanup excess dunnage/traps/debris within Hold 2.
1300-		Loading Trucks					1300- Continue loading plywood bundles to trucks. All plywood bundles loaded out.
No Stevedore Damage to Vessel							
3 x Dumpster filled with dunnage							

Stevedore Superintendent:

Captain/Chief Mate:



SuperCargo/Port Captain:

EXHIBIT 4

Canton Port Services LLC

3800 Newgate Avenue, Ste 2

Baltimore, MD 21224

TEL: 410-633-1601

Fax: 410-633-3475

Date	Invoice #
8/15/2022	132524

		Bill To
Vessel / Voyage	MV Indigo Spica	Hanwin Shipping Limited
Date of Arrival	8/6/2022	
		Attention: Justin Cao

Quantity	Rate	Description	Amount
74.75	3,200.00	Extra Labor Charges USD 3200.00/ gang hour 74.75 gang hours 8/6/22 - 8/12/22	239,200.00
53	450.00	Overtime Charges USD 450.00/ gang hour 53 gang hours 8/6/22 - 8/12/22	23,850.00
14	650.00	Dumpster charges USD 650.00 per dumpster 14 dumpsters 8/6/22 - 8/12/22	9,100.00
2,796	-14.00	Credit for Stow to End of Hook Charges 8/6/22 - 8/12/22	-39,144.00

REMIT TO Canton Port Services LLC
C/O Chase
JP Morgan Chase, N.A.
Fed. Routing No. 021000021
Account No. 766833995
Swift Code: CHASUS33

Terms

Total

\$233,006.00

Balance Due

\$233,006.00